

REMARKS/ARGUMENTS

1.) Claim Amendments

Claims 2-6, 11, 19, 20, 32-34, and 39-48 are pending in the application. Claims 39-48 have been added herein. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

2.) Claim Rejections – 35 U.S.C. § 103(a)

The Examiner rejected claims 1-9, 11, 16, 19, 20, 31-36 and 38 under 35 U.S.C. § 103(a) as being unpatentable over Johansson (US 2002/0080752) in view of Acharya, *et al.* (US 6,829,709).

The Applicants' claims are directed to a method and arrangement for access control for a movable network managed by a mobile router. The mobile router filters uplink packets to eliminate unauthorized packets before they are transmitted over the air interface. A mobility anchoring agent filters downlink packets in the same manner.

The Examiner cites Johansson for showing the mobility anchoring agent and mobile router, and cites Acharya for showing the filtering steps. The Applicants have amended the claims and added new claims 39-48 to distinguish the claimed invention from Johansson and Acharya.

Johansson relates to a route optimization technique, and shows only a home agent and a foreign agent, which cooperate to improve packet routing. Their function, therefore, is entirely different from the claimed invention in which the mobile router and mobility anchoring agent cooperate to eliminate the transmission of unauthorized packets.

The cited passages of Acharya (col. 4, lines 11-51; and FIG. 1) do not disclose filtering, but rather IP transformations. Acharya claim 5 recites that a router is configured to form a filtering agent, but there is no disclosure of what is being filtered. Thus, there is no disclosure or suggestion that the filtering agent is filtering out unauthorized packets prior to transmission over a radio air interface. The Examiner,

however, states that Acharya discloses encryption and authentication functions, and the Examiner contends these functions prevent the transmission of unauthorized packets.

The Applicants have canceled independent claims 1, 16, 31, and 38 and have added new independent claims 39, 44, and 47 to distinguish the claimed invention from Johansson and Acharya. New claim 39, for example, recites a method of access control for a movable network managed by a mobile router, wherein the mobile router is interconnected through a bi-directional radio link with a mobility anchoring agent that anchors the network mobility for the mobile router. The bi-directional link has been clarified to be a radio link. The mobile router receives access control filter information originating from an access control source. It has been clarified that the mobile router receives the access control filter information at least in part over the bi-directional radio link via the mobility anchoring agent. The mobile router then configures a first access control module with the access control filter information, and the module filters uplink packets according to the access control filter information to eliminate unauthorized uplink packets. The mobile router then transmits the filtered uplink packets to the mobility anchoring agent over the bi-directional radio link.

Dependent claims recite that the mobility anchoring agent also receives access control filter information and filters downlink packets being transmitted to the mobile router. Additionally, the access control filter information may be received through either a flat or a hierarchical provisioning architecture. In the flat provisioning architecture, the mobility anchoring agent and the mobile router receive the same access control filter information. In the hierarchical provisioning architecture, the mobility anchoring agent receives the access control filter information and configures its access control module with a first portion of the access control filter information related to downlink packets, and subsequently forwards to the mobile router, a second portion of the access control filter information related to uplink packets.

Dependent claim 43 recites that the access control filter information includes packet-filtering rules for controlling access to particular services, and the filtering steps are performed after nodes in the movable network are authenticated and authorized access to the network. Thus, the authentication functions are separate independent functions from the filtering process. This feature is not taught or suggested by

Acharya's authentication functions. Basis for claim 43 is found in the PCT specification on page 12, lines 21-24.

The Applicants respectfully submit that many of these limitations are not taught or suggested by the combination of Johansson and Acharya. Basis for the amendments is found in the original PCT specification on page 6, line 29 through page 7, line 18; page 7, lines 20-23; page 10, lines 6-12; page 11, lines 4-9; page 12, lines 21-24; page 13, lines 4-8; page 13, lines 14-28; page 14, lines 7-17; page 15, lines 15-19

For all the above reasons, the Applicants respectfully submit that the combination of Johansson's route optimization and Acharya's filtering agent does not establish a *prima facie* case of obviousness with respect to the new and amended claims. Therefore, the allowance of independent claims 39, 44, and 47 is respectfully requested.

The remaining claims depend from the new independent claims and recite further limitations in combination with the novel and unobvious elements of the independent claims. Therefore, the allowance of dependent claims 2-6, 11, 19, 20, 32-34, 40-43, 45, 46, and 48 is respectfully requested.

3.) Conclusion

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 2-6, 11, 19, 20, 32-34, and 39-48.

The Applicants request a telephone interview if the Examiner has any questions or requires any additional information that would expedite the prosecution of the Application.

Respectfully submitted,

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